

June 2, 2006

Via First Class Mail and Electronic Mail

Mr. Dave Woelfel
Mr. Mark Adelson
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Subject: Comments Regarding 2006 Triennial Review of the
Water Quality Control Plan – Santa Ana River Basin

Dear Messers Woelfel and Adelson:

Southern California Edison Company (SCE) wishes to thank the Santa Ana Regional Water Quality Control Board (Regional Board) for this opportunity to provide input into the Regional Board's 2006 Triennial Review of the Water Quality Control Plan – Santa Ana River Basin (Basin Plan). In particular, SCE strongly supports certain of the proposed updates to Beneficial Use Table 3-1 in the existing Basin Plan. The existing Basin Plan is not reflective of current conditions and likely future conditions in certain stream reaches. The Regional Board staff has identified appropriate changes and included them in Issue No. 13.2 attached to the May 2, 2006 Meeting Announcement regarding the Stakeholder Meeting for the Triennial Review of the Basin Plan.

SCE holds three licenses from the Federal Energy Regulatory Commission (FERC) for the operation of hydroelectric projects on Lytle Creek (Project No. 1932), Mill Creek (Project No. 1934), and the Santa Ana River (Project No. 1933).¹ After the diversion of water from these hydroelectric projects, the water is immediately released into pipelines owned and operated by local water supply companies for domestic, irrigation, and other beneficial uses. The proposed changes in Issue No. 13.2 appear to be intended to make stream reaches and the beneficial use designations consistent with the situation that has existed for over the past 100 years.

¹ The three FERC licenses and the FERC Environmental Assessment for the three licenses, prepared pursuant to the National Environmental Policy Act, are attached to this letter.

Issue No. 13.2 would add new stream reach segments in Lytle Creek, Mill Creek, and the Santa Ana River. The new reaches would coincide with existing hydroelectric and water supply infrastructure and operations and would better represent the state of these streams for the past 100 years. However, SCE recommends that the stream reaches listed in Issue No. 13.2.a, c, and d be modified to read:

- 13.2.a Lytle Creek from I-15 to ~~Turk Point or Miller Narrows~~ – change to I-COLD and list as Reach 1.
- 13.2.a Lytle Creek from Miller Narrows to headwaters – list as Reach 2.
- 13.2.c Mill Creek from Highway 38 to ~~above the confluence with Mountain Home Village Creek~~ – list as Reach 2.
- 13.2.d Mill Creek from the confluence with Mountain Home Village Creek to the upper diversion, Forest Falls – change to I-COLD and list as Reach 3.

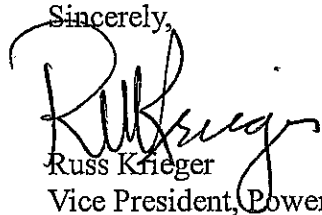
The diversion dam for the Lytle Creek Hydroelectric Project is located at Miller Narrows, which is upstream of Turks Point. Therefore, the more appropriate upstream end of the reach is at Miller Narrows. Issue Nos. 13.2.c and d identify the upstream terminus of reach 2 and the downstream terminus of reach 3 as Mountain Home Village. However, Mountain Home Village is not on Mill Creek itself, and the location of the town runs adjacent to Mill Creek for some distance. Thus, it would be unclear exactly where reach 2 ends and reach 3 begins. The terminus is important as the reaches would have different designated beneficial uses. SCE recommends that the co-terminus point of demarcation for Mill Creek reaches 2 and 3 be the confluence of Mill Creek and Mountain Home Creek. Previously, water from Mountain Home Creek and Mill Creek just upstream of confluence of Mill Creek and Mountain Home Creek was diverted by SCE's into its Mill Creek No. 2 powerhouse. Now, the Federal Energy Regulatory Commission has given SCE permission to decommission those diversion dams. Thus, water flow from Mountain Home Creek will enter Mill Creek at their confluence, making it a good demarcation for the terminus of reaches 2 and 3.

Additionally, the three new listed stream reaches that coincide with the hydroelectric projects' bypass reaches would have a different designated beneficial use compared to the designated uses currently listed for the larger area encompassing those stream reaches. Each of the three new stream reaches would be designated as an "I-COLD" designation.² SCE concurs that the current "COLD" designation is inappropriate as these three stream reaches have not achieved a "COLD" water use for over 100 years, if in fact they were ever "COLD" streams. The recent issuance of the FERC licenses for the three SCE hydroelectric projects provides that SCE will continue to divert water from these three stream reaches, except for leakage, for over the next 25 years. However, it is unclear if the "I-COLD" designation is the most appropriate characterization for these three stream reaches, instead of an "I-WARM" or "WARM" designation. SCE would like to discuss the available information about the water temperature and quantity in these three stream reaches with Regional Board Staff to address this issue.

² The three stream reaches are: Lytle Creek from I-15 to Miller's Narrows, Mill Creek from Mountain Home Creek to the upper diversion at Forest Falls, and Santa Ana River from Seven Oaks Dam to Powerhouse No. 1.

Also, the designation of the three new stream reaches described above may cause other minor changes to Table 3-1 to reflect the appropriate beneficial uses in the stream reaches. For Lytle Creek, Issue No. 13.1.c proposes to add a "SPAWN" designation. This new designation should only apply to Reach 2. A "SPAWN" may not be appropriate for Reach 1. For Mountain Home Creek, the "POWER" designation may be removed as SCE is decommissioning the diversion dam on Mountain Home Creek. For Mill Creek Reach 1, a "POWER" designation should be added. The Mill Creek Powerhouse No. 1 diverts water from the upstream end of Reach 1. Powerhouse No. 1 has been in operation since 1893 and is the oldest powerhouse owned by SCE. The Santa Ana River Reach 5 (up to the Seven Oaks Dam) should also include "POWER", as SCE's Santa Ana River No. 3 powerhouse is just downstream of the Seven Oaks Dam, which is the upstream terminus of Reach 5.

The changes proposed in Issue No. 13.2 are important to SCE as they will ensure that the Basin Plan is consistent with existing conditions, including continued operation of the hydroelectric projects and water supply infrastructure, as has occurred over the last 100 years. To the extent that the Regional Board needs technical or other assistance in completing the work associated with Issue No. 13.2, SCE may be able to provide that assistance to the Regional Board. SCE looks forward to working with Regional Board staff to prepare a plan to provide the Regional Board with all the information it needs to address this issue in the development of the next Basin Plan. Should you have any questions, please contact Mr. John Irwin at (909) 394-8715.

Sincerely,

Russ Krieger
Vice President, Power Production

cc: Gerard J. Thibeault, Executive Officer
John F. Irwin